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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LOUJAIN HATHLOUL ALHATHLOUL,

Plaintiff,

vs.

DARKMATTER GROUP, MARC BAIER,
RYAN ADAMS, and DANIEL GERICKE,

Defendants.

Case No. 3:21-cv-01787-IM

**INDIVIDUAL DEFENDANTS' RESPONSE
TO MINUTE ORDER OF JANUARY 31,
2025**

Although there are sufficient grounds to dismiss the Alien Tort Statute claim regardless of the views of the State Department, including the lack of personal jurisdiction over any defendant and the lack of subject-matter jurisdiction over the ATS claim, the Individual Defendants do not object to the Court's requesting the State Department's views and defer to the Court's sound discretion.

DATED this 5th day of February, 2025.

SNELL & WILMER L.L.P.

/s/ Clifford S. Davidson

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